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Remarks

The present response is to the Office Action mailed in the above referenced case on 06/06/2005. Claims 1-31 are standing for examination.

The Examiner has rejected claims 1-14, 16-21, 23-25 and 27-30 under 35 U.S.C. 102(e) as being anticipated by Freishtat (U.S. 6,317, 783), hereinafter Freishtat. Claims 1-31 are rejected under 35 U.S.C.103(a) as being unpatentable over Willis Jr. et al. (U.S. 6,738,815 B1), hereinafter Willis, in view of Dent et al. (6, 128,603), hereinafter Dent, and further in view of Tanaka (JP 2000235514 A) hereinafter Tanaka.

Applicant has carefully studied the prior art references provided by the Examiner, and the Examiner's rejections, objections, statements and response to prior arguments portion of the instant Office Action. Applicant herein provides arguments which clearly distinguish applicant's invention, as claimed, over the art provided by the Examiner.

In response to the 102(e) rejection of applicant's claims 1-14, 16-21, 23-25 and 27-30, applicant herein points out to the Examiner that independent claims 1, 5, 9, and 16 include the limitation of: "wherein the first enterprise collects, aggregates and stores the information and periodically provides the information to the second enterprises, specific to each second enterprise, and the second enterprises customizes the presentation of the information suitable to the specific individual before delivery of the information to the specific individual."

Applicant argues that Freishtat fails to teach and implement the plurality of second enterprises, as claimed. Freishtat teaches one processor which collects personal information, aggregates it, stores it and delivers it to the end user. The Examiner states that Freishtat teaches said limitation in Figs. 5-6 and column 5, lines 32-55.

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Applicant points out that the portion of Freishtat relied upon by the Examiner teaches that: " When an attempt is made to access PI by an end user 210 directly, or through an intermediary Web server, the PI access transact component 340 of the PI engine 240 would retrieve stored PT 375 from the PI store 280. Under this approach, this stored PI 375 would be received directly from cookies sent by the client computer 220 of the end user 210. The PI access transact component 340 would perform any decryption if necessary. Any updates required would be obtained by direct access of PI providers 250. The PI deliver component 350 would provide the mechanism for both updating the PI store 280 as well as transmitting the requested PI to the end user 210, directly or through an intermediary Web site. The PI deliver component 350 would place the updated PI in the PI store 280 by replacing the outdated PI cookies 375 stored on the client computer 220. The PI deliver component 350 would also handle any encryption if necessary. The PI deliver component 350 would also be responsible for transmitting requested PI. In a preferred embodiment, the PI store 280 would be implemented using this cookie-based architecture.

Applicant argues that the above teaching of Freishtat teaches the same enterprise is accessed directly utilizing cookies, even though an intermediary Web site may be used. Also, applicant points out that using an intermediary Web site does not necessarily read on a separate enterprise. The same enterprise could also host the intermediary Web site. Freishtat does not teach that the first enterprise collects, aggregates and stores the information and periodically provides the information to the second enterprises, specific to each second enterprise, and the second enterprises customize the presentation of the information suitable to the specific individual before delivery of the information to the specific individual.

Independent claims 23, 27 and dependent claim 28 recite that the individual ones of the second enterprises publish transaction protocols, including a set of instructions corresponding to transactions, to the first enterprise, which then provides transaction

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protocol to the individual ones of the specific individuals, allowing transactions at the second enterprises to be managed by the specific individuals through the system.

The Examiner states that Freishtat teaches said limitation in column 4, lines 29-32. Applicant interprets said portion of Freishtat to read that stale information may be refreshed in the PI store by accessing and acquiring PI (personal information) from the information provider's Web site. Applicant argues that there is no teaching in Freishtat wherein an information provider *publishes* transaction protocols. Therefore, Freishtat fails to anticipate applicant's claimed limitation.

Regarding the 103 rejection of applicant's independent claims, the Examiner states that Willis teaches a system for collecting information for specific individuals, aggregating and storing the information. The Examiner continues to state that Willis fails to teach the system wherein there is interaction between providers' sites and different enterprises. The Examiner seems to rely upon the art of Dent to provide this feature.

Applicant makes special note that applicant's claims do not include this limitation. The majority of applicant's independent claims are further specifically limited to recite that the first enterprise collects, aggregates and stores the information and periodically provides the information to the second enterprises, specific to each second enterprise, and the second enterprises customize the presentation of the information suitable to the specific individual before delivery of the information to the specific individual.

Applicant believes, in this instance, the Examiner is customizing the applicant's claim limitations to fit the teachings of the art. There is absolutely no teaching or suggestion in the art of Willis or Dent wherein the first enterprise collects, aggregates and stores the information and periodically provides the information to the second enterprises, specific to each second enterprise, and the second enterprises customize the presentation of the information suitable to the specific individual before delivery of the information to

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the specific individual.

Applicant further argues that Willis teaches a system allowing remote technicians to access legacy systems within a network to gather database information enabling them to service their clients. Dent teaches a billing service wherein the biller decides what bill and formats the representation and sends the bill to the customer (col. 3, lines 1-5). Dent's system is primarily concerned with managing cash flow from the customer's bank account to maximize interest bearing accounts. There is no teaching of having the first enterprise collect, aggregate and store the information and periodically provide the information to the second enterprise, specific to each second enterprise, and the second enterprises customize the presentation of the information suitable to the specific individual before delivery of the information to the specific individual.

Willis teaches that a user sends a request for legacy data to a transaction broker, which forwards the request for data to an interface process. It is the interface process in Willis that conducts transaction sessions in order to retrieve the requested data from the legacy systems, and the interface process then returns the data to the transaction broker. The transaction broker then formats the data into a reply message sent to the user, but there is no teaching or suggestion in Willis that the data is formatted into a custom presentation suitable to the requesting user, as is taught in applicant's invention and recited in the claims as amended.
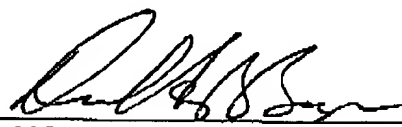
Willis in combination with Dent is simply not capable of teaching applicant's invention as described above, due to the lack of infrastructure, i.e., a first enterprise providing a main service, and a plurality of second enterprises providing the data to the main service for aggregating and storing, and then receiving the aggregated data from the main service and formatting the data into a custom presentation for the benefit of the requesting user.

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For the above reasons, applicant believes that applicant's independent claims, as argued above, are clearly and unarguably patentable over the combined art of Willis, Dent and Tanaka in the 103(a) rejection. Applicant has also provided valid argument against the art of Freishtat as not anticipating applicant's independent claims. Depending claims 2-4, 6-8, 10-15, 17-22 and 24-30 are then patentable on their own merits, or at least as depended from a patentable claim.

As all of the claims standing for examination have been shown to be patentable as amended over the art of record, applicant respectfully requests reconsideration, and that the present case be passed quickly to issue. If there are any time extensions needed beyond any extension specifically requested with this response, such extension of time is hereby requested. If there are any fees due beyond any fees paid with this amendment, authorization is given to deduct such fees from deposit account 50-0534.

Respectfully Submitted,
Gregg Freishtat et al.

by
Donald R. Boys
Reg. No. 35,074

Central Coast Patent Agency
P.O. Box 187
Aromas, CA 95004
(831) 726-1457